

PRIVACY NOTICE FOR HEALTHCARE PROFESSIONALS

1. WHO WE ARE

Immedica Pharma AB, with registration number 556835-6322 (“**Immedica**”), is a Swedish pharmaceutical company commercializing medicinal products for rare diseases primarily in Europe and the Middle East. We are responsible for the processing of your personal data since we decide why and how the personal data is processed and are therefore the data controller under this Notice. Immedica may exercise this responsibility alone or jointly with other company(-ies) in the Immedica group. In this Notice, the terms “Immedica”, “we” or “us” refer to Immedica and its group companies.

2. ABOUT THIS PRIVACY NOTICE

Immedica invites you to read this Notice, which sets out in which context we are processing information that relates directly or indirectly to you as an individual and explains your rights with respect to the processing of your personal information. Immedica is committed to ensuring that any personal data we collect is processed and protected in accordance with applicable data protection laws and Immedica policies and standards.

The purpose of this Notice is to inform how we process personal data of healthcare professionals (“**HCPs**”) in connection with our interactions, communications and other engagements with you. In this context, we are committed to keeping you fully informed about our activities involving the processing of your personal data pertaining to the management and development of Immedica’s relationships with HCPs.

3. CATEGORIES OF PERSONAL DATA WE MAY COLLECT ABOUT YOU

Depending on how you interact with us and for what purpose, we collect and process different types of personal data about you. In order for you to more easily understand what type of personal data we may process about you, we have categorized the personal data into the following categories, including data elements:

Personal data that we may collect about you for purposes contemplated in this Notice	
Category	Description and examples of personal data
Contact Details	<ul style="list-style-type: none"> • First and/or last name, and/or initials • Working address • E-mail • Telephone/mobile number • Profession/Title • Bank account details (either your own bank account details if you, for instance, perform consultancy services to us as a subsidiary activity outside your employment/assignment with your employer, or your employer’s bank account details)
Demographic Information	<ul style="list-style-type: none"> • Age • Gender

Personal data that we may collect about you for purposes contemplated in this Notice	
Professional Information	<ul style="list-style-type: none"> • Information related to your areas of expertise • Title • Place of practice • Professional registration or license ID-number and/or medical practitioner number
Professional Biography	<ul style="list-style-type: none"> • Resume • Photograph • Academic information • Your interests (such as any specific healthcare topics about which you request information from Immedica)
Details of Interactions	<ul style="list-style-type: none"> • Summaries of our interactions, for instance what kind of meetings we have held, topics discussed and what kind of material we have displayed to you
Transfers of Value	<ul style="list-style-type: none"> • Contributions to costs of educational events (e.g. registration fees, travel and accommodation expenses) • Fees for services, including consultancy services • Funding in connection with sponsorship or medical grant

4. CATEGORIES OF RECIPIENTS WHO WE MAY SHARE PERSONAL DATA WITH

We may share or transfer your personal data to third parties. The table below describes the categories of such third-party recipients. Please see Section 7 where we specify in further detail in which instances we may share your personal data to third parties.

Category of third-party recipients	Description
Staff	Refers to employees or in-house consultants at Immedica
Authorities	Refers to national or multinational authorities and public agencies or bodies
External Service Providers	Refers to third-party party service providers appointed by Immedica for the provision of professional services which we cannot perform ourselves. Examples of external service providers are IT and software providers and business service consultants
Business Partners	Refers to companies supporting Immedica in commercializing our products. Examples of business partners are contract manufacturers, wholesale and transport companies and license and distribution partners

5. HOW WE COLLECT PERSONAL DATA

Immedica collects personal data under this Notice in various ways, including:

- directly from you;
- when you sign up with us to receive promotional material;
- when you engage with one of our sales representatives;
- when you attend offline or online meetings arranged by Immedica, such as advisory boards, symposiums or conferences;
- when we enter an agreement with you;

- when you respond to any surveys that you may choose to participate in; and/or
- through third parties or through trusted publicly available sources (such as patient organisations, data companies providing information services in the healthcare sector).

6. FOR WHAT PURPOSES DO WE USE PERSONAL DATA AND WHAT LEGAL BASIS DO WE RELY ON

The table below explains the categories of personal data and the purposes for which Immedica processes your personal data in connection with interactions and cooperations with healthcare professionals. We have also described the legal basis we rely on and for how long we will store your personal data.

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
To respond to your queries and provide you with information when you request it or when we believe our products and services may be of value to you.	Contact Details, Professional Information, Professional Biography, Details of Interactions	Legitimate interest	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To manage and administer customer data and handle customer relationships, such as manage, plan and execute communications and interactions with you as well as keeping records of interactions.</p>	<p>Contact Details, Demographic Information, Professional Information, Professional Biography, Details of Interactions</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To provide you with appropriate, adequate and updated information about disease, medicines as well as our products and services.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To invite you to provide feedback, participate in research, surveys or attend events organized by us and to plan and improve our business activities.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To send direct marketing materials to you (you will always have the right to opt out of marketing and promotional communications).</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To interact with you through online or offline advisory forums, symposiums, conferences, webinars or similar events.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for 36 months after your last interaction with you.</p>
<p>To keep records related to our relationship and interactions with healthcare professionals in order to comply with applicable laws and regulations, including industry codes.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions, Transfers of Value</p>	<p>Legal obligation</p>	<p>For the duration of the contract, plus the time until legal claims under the contract become time-barred.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To report and disclose any transfers of value in connection with your interactions with us, for instance in connection with expert services that you provide to us, and related activities in order comply with applicable transparency obligations according to applicable laws and industry codes.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions, Transfers of Value</p>	<p>Legal obligation</p>	<p>For the duration of the contract (either the contract we have directly with you or through your company, or with your employer), plus the time until legal claims under the contract become time-barred.</p>
<p>To manage agreements that we may have with you, including to reimburse you for expenses, pay invoices for services you provide to us or to perform our contractual rights and obligations.</p>	<p>Contact Details, Professional Information, Professional Biography, Details of Interactions, Transfers of Value</p>	<p>Performance of a contractual obligation</p>	<p>For the duration of the contract (either the contract we have directly with you or through your company, or with your employer), plus the time until legal claims under the contract become time-barred.</p>
<p>To exercise or defend Immedica against potential, threatened or actual claims or litigation.</p>	<p>Contact Details, Demographic Information, Professional Information, Professional Biography, Details of Interactions, Transfers of Value</p>	<p>Performance of contractual obligation</p>	<p>For the duration of the contract (either the contract we have directly with you or through your company, or with your employer), plus the time until legal claims under the contract become time-barred.</p>

7. WHO WE SHARE YOUR PERSONAL DATA WITH

Immedica will not share or transfer your personal data to third parties other than those indicated in this Notice. In connection with the activities and for the same purposes as those listed in this Notice, your personal data can be accessed by, or disclosed to, the following recipients with a justified need to access the information in accordance with applicable legislation:

Category of recipient	Categories of personal data
Staff	Contact Details, Demographic Information, Professional Information, Professional Biography, Details of Interactions, Transfers of Value
Authorities	Contact Details, Demographic Information, Professional Information, Professional Biography, Details of Interactions, Transfers of Value
External Service Providers	Contact Details, Demographic Information, Professional Information, Professional Biography, Details of Interactions, Transfers of Value
Business Partners	Contact Details, Professional Information, Professional Biography, Details of Interactions, Transfers of Value

8. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

We strive to process your personal data within the EU/EEA. However, due to the global nature of Immedica’s operations, Immedica shares personal data to companies and Staff in the Immedica group, External Service Providers, Authorities and Business Partners when we perform the activities described in this Notice. Some of the recipients of your personal data as stated above may reside outside the EU/EEA. The level of legal protection for personal data is not the same in all countries and may not provide the same level of protection as the data protection laws in the EU/EEA or of the country in which you live.

In case of a transfer of your personal data to recipients based in countries outside the EU/EEA, Immedica will take reasonable efforts and adopt adequate safeguards to keep your personal data processed in line with applicable requirements under the GDPR. These safeguards consist of one of the following legal mechanisms:

- (a) **Standard Contractual Clauses.** According to these clauses, the recipient of your personal data needs to protect your personal data and provide you with rights and protection that are on the same level as EU-standards. These clauses have been adopted by the European Commission.

- (b) **Adequacy Decision by the European Commission.** This means that we transfer personal data to countries outside the EU/EEA which have adequate level of data protection, according to a decision adopted by the European Commission. [Follow this link](#) to see which countries that have received an adequacy decision by the European Commission.

9. YOUR RIGHTS

You have several rights in accordance with applicable data protection legislation, including the GDPR. You have the right to:

- **request information** about your personal data processed by Immedica;
- **request correction** of your personal data if incorrect or incomplete;
- **request transfer** of your personal data to you or another person in a commonly utilizable format;
- **file a complaint** to a data protection authority;
- **object to processing** of your personal data as far as such processing is only based on Immedica's legitimate interest;

- **request the deletion** of your personal data if they are no longer necessary for the purposes of processing or there is no legal ground for their further processing.

Please note, however, that these rights may be limited in order to fulfil legal obligations. Your rights are limited where there is a legal ground for processing your personal data, for example we cannot delete information that has been collected as part of an adverse reaction report unless it is inaccurate. Immedica may require you to provide proper identification before we comply with any request to access or correct your personal data.

10. HOW TO CONTACT US

The company responsible for the processing of personal data and that acts as the data controller under this Notice is:

Immedica Pharma AB
Solnavägen 3H
113 63 Stockholm
Sweden

If you want to reach any of us, have questions or want to exercise your rights explained above, you are welcome to contact us. Please do so by sending an e-mail to privacy@immedica.com.

11. CHANGES TO THIS NOTICE

We work continuously with improving our products and services and may update this Notice from time to time. We encourage you to periodically review this page for the latest information on our privacy practices.